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March 18, 2025

BY ECF

Hon. Jennifer L. Rochon
U.S. District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Keith Taylor*
24-cr-00524 (JLR)

Dear Judge Rochon:

I represent defendant Keith Taylor in the case referenced above. I write to Your Honor for two reasons: (1) to provide the Court with a status update, and (2) to request that the Court appoint CJA counsel for Mr. Taylor, as he is no longer able to retain and pay for retained counsel.

Status Report: The defense and the government have engaged in plea negotiations. Those discussions, however, have not resulted in a plea agreement. As of the date of this letter, Mr. Taylor intends to proceed with a jury trial, which is currently scheduled to commence on May 12.

CJA Counsel: Mr. Taylor engaged undersigned counsel in or about May 2023. Since his arrest on June 11, 2024, however, he has been unable to regularly and fully pay his legal fees. As a result of his arrest, subsequent indictment on September 4, 2024, and specific bail conditions that preclude him from earning income from Modest Needs Foundation (MNF), the charity he founded and operated since 2002, he no longer can pay his legal fees. *See* ECF # 4 (Appearance Bond) at 5 (ordering Mr. Taylor to remove his name from all MNF bank accounts); ECF # 16 (letter from Government requesting bail modification to “prohibit [Mr. Taylor’s] continued employment at [MNF][.]”); ECF # 19 (endorsed Order granting Government’s request to modify release conditions).

Mr. Taylor has made efforts to raise funds to continue to engage retained counsel. He has asked family and friends for loans and/or financial assistance. He also created a GoFundMe profile to try and fund his legal defense. These efforts, however, have not raised sufficient funds for his continued defense, especially considering the upcoming trial-related filings, the trial itself, and potential post-trial filings. In addition to this letter-motion requesting appointment of CJA counsel, the defense is filing a separate,

ex-parte, letter with the Court today providing additional details regarding Mr. Taylor's financial condition and the background and history of his relationship with undersigned counsel. The defense has discussed the general contents of that submission with counsel for the Government, but the letter is being filed *ex parte* because it relates to the attorney-client relationship between Mr. Taylor and undersigned counsel. Mr. Taylor is in the process of completing the financial affidavit required for CJA appointments.

For the reasons set out above, and in the *ex parte* letter being submitted to the Court today, I respectfully request that the Court appoint CJA counsel for Mr. Taylor.

Respectfully submitted,

/s/Brian P. Ketcham
Brian P. Ketcham

Cc: AUSAs Rebecca Delfiner and Eli Mark (via ECF)